

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIM NO. 04-30046-MAP

V.

JOSEPH SULLIVAN, ET AL  
Defendants

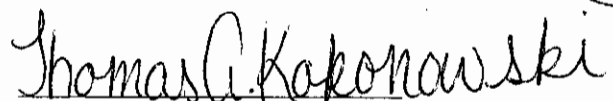
MOTION OF DEFENDANT JOSEPH SULLIVAN  
TO EXTEND STAY FOR SELF REPORTING

The defendant herein requests that the imposition of sentence be stayed until January 30, 2007 and that he be ordered to self report to the facility designated by the Bureau of Prisons on that date. In support hereof the defendant sets forth the following:

1. The defendant has currently been ordered to report on December 12, 2006.
2. Pursuant to their instructions at his sentencing, the defendant has, again, inquired of the U.S. Marshall Service of his designation and has learned that the Bureau of Prisons has been behind in making his designation and that he would not be designated by December 12, 2006.
3. Additional time is also needed in order to protect his home from foreclosure.

WHEREFORE, the defendant requests a stay for his self reporting to the designated facility until January 30, 2007.

THE DEFENDANT  
By His Attorney

  
Thomas A. Kokonowski, Esq.  
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Springfield, MA 01103  
413-737-9700  
BBO# 564549

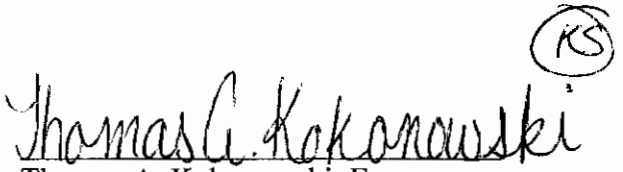
CERTIFICATE OF SERVICE

I, Thomas A. Kokonowski, Esq., hereby certify that on this 6th day of December, 2006, a copy of the forgoing has been served in hand to

U.S. Attorney's Office  
1550 Main Street, Suite 310  
Springfield, MA 01103

Richard Rinaldi  
U.S. Probation Officer  
Probation Department  
1550 Main Street, Room 212  
Springfield, MA 01103

Subscribed under the penalties of perjury.

  
Thomas A. Kokonowski, Esq.